OCT 06

Via Fax and Mail

Gwen Zervas, Case Manager
Bureau of Federal Case Management
Department of Environmental Protection
401 East State Street (CN-028)
Trenton, New Jersey 08625

Re: Supplemental Comments on the Work Plan to Evaluate Additional Technologies to Enhance On-Site Free Product Recovery, L.E. Carpenter Superfund Site, Wharton, New Jersey

Dear Ms. Zervas:

In response to your request of September 20, 2000, the following are specific types of information which should be included in the above work plan with respect to the proposed pilot testing, pages 9-11. Please note that the following are supplemental to the United States Environmental Protection Agency's (EPA) comment letter dated September 12, 2000, and not a replacement to it.

1. Information on the proposed drilling activities should include, at a minimum: a) the location and total depth of borings, b) basic details of drilling methods (whether hollow stem auger or other method) c) how boreholes will be logged (whether continuous split spoon, spaced, etc.) d) well construction details, including materials to be used, annulus materials and screen intervals, etc.. Note that some of this information was provided for the MPE well, but it was not complete and no such information was provided for any of the other wells and monitoring points.

2. The text stated that existing monitoring wells "would be utilized" and other more distal wells "may be monitored." And note that with regards to frequency of monitoring the text states only that it will occur "before, during, and after the test at regular intervals." Obviously, adequate evaluation of testing

results necessarily depends upon the information obtained via a well thought out monitoring program. The details on which wells will be monitored along with the parameters to be measured at each point, type of equipment used for monitoring, and frequency of monitoring should all be provided up front in the work plan.

3. The work plan should include a discussion and details regarding how extracted materials will be treated, stored and disposed of, as well as any relevant figures showing the process. At present the document states only that product would be temporarily stored, but not where or for how long a period. The documents also states that groundwater would "likely be treated...with appropriate technology," as per Page 6, however, no further information is provided on the details. Last, a plan for monitoring and treating the vapor phase should also be included.

4. Regarding the proposed steam injection testing, this technology has the potential to mobilize volatile compounds both into soil vapor and to the surface. Because of this, soil vapor monitoring for VOCs should be included in this portion of the testing as well as during the chemical oxidation phase.

5. With respect to the chemical oxidation bench test, I previously indicated I would provide an approved bench test work plan from another site, to serve as a suitable guide for this project. Please note, of the two site work plans considered, for one, I am still waiting on final approval from the site's Potential Responsible Parties (PRPs), and for the second, I am waiting on final word from EPA's Ada, Oklahoma, laboratory. As such, a plan will be forwarded as soon as it becomes available.

6. With respect to the chemical oxidation pilot test, it is recognized that pilot testing is intended only as a "conceptual design," and that a separate work plan will presumably be prepared, if necessary, based on the results of the bench testing, and that injection well construction and similar details will be discussed at

that time, however, the plan made a point to state that black iron would be used. Please not that use of this material would need to be justified and perhaps rethought, as it seems likely the oxidants could severely corrode an iron well.

Once again, thank you for the opportunity to review and provide comments on this document. Please feel free to contact me to discuss this matter further at (212) 637-4411.

Yours truly,

Stephen Cipot, Project Manager
Southern New Jersey Remediation Section

cc: Carole Petersen, Chief, NJRB
MaryAnne Rosa, Chief, SNJRS
Andy Crossland, PSB

bcc:Stephen Cipot, SNRJS